

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

SHANNON PHILLIPS

Plaintiff,

v.

**STARBUCKS CORPORATION d/b/a/
STARBUCKS COFFEE COMPANY**

Defendant.

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CIVIL ACTION NO. 19-19432

**JOINT STIPULATION TO FILE A SECOND AMENDED COMPLAINT
PURSUANT TO FED.R.CIV.P. 15(A)(2)**

Plaintiff, Shannon Phillips (“Plaintiff”) and Defendant Starbucks Corporation d/b/a Starbucks Coffee Company (“Defendant”), through their undersigned counsel, submit the following Joint Stipulation and request that the Court grant Plaintiff leave to file a Second Amended Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. In support of their stipulation, the parties state as follows:

1. Plaintiff initiated this action by filing a Complaint in this Court on October 28, 2019 against Defendant;
2. Following letter practice to the Hon. Renee Marie Bumb regarding Defendant’s intention to file a Motion to Dismiss and a Motion to Transfer, Plaintiff filed an Amended Complaint on or about January 22, 2020.
3. Thereafter, it came to Plaintiff’s counsel’s attention that Plaintiff’s Amended Complaint contained a typographical error on certain dates.

4. The Amended Complaint identified the date of Plaintiff's termination, and the day before, as occurring in the year 2019.

5. The correct year is 2018.

6. Counsel for Plaintiff and Defendant conferred regarding these typographical errors.

7. As a result of the conference, counsel for Plaintiff and Defendant stipulated that in the interest of justice and efficiency of resources, Plaintiff should be allowed to file a Second Amended Complaint pursuant to Fed. R. Civ. P. 15(A)(2).

WHEREFORE, the parties stipulate through their respective attorneys of record that:

8. Plaintiff may file her Second Amended Complaint, a copy of which is attached hereto as "Exhibit A."

Respectfully submitted,

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Dated: August 5, 2020

So ordered this ____ day of August, 2020

The Hon. Joel H. Slomsky, U.S. D. J.